



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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MKM:TH/MKP  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 19, 2018

By ECF

The Honorable Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

Dear Judge Scanlon:

The government respectfully submits this letter to request an extension—until next Tuesday, November 27—to provide the Court with an update on privilege issues.

Counsel for defendant Clare Bronfman and counsel for defendant Keith Raniere have both indicated they intend to assert attorney-client privileges as representatives of the entity Nxivm. The government has been in contact with Michael J. Sullivan, Esq., counsel for Nxivm, who has indicated that he represents the entity with respect to questions of privilege. The government has asked Mr. Sullivan to provide information as to what, if any, privileges he intends to assert on behalf of the entity, and whether there was a reasonable expectation of privacy in communications transmitted over and maintained on Nxivm's company server.

Mr. Sullivan initially estimated that he would provide this information by, at the latest, today, November 19, 2018, but has now informed the government that he expects to provide this information tomorrow. Accordingly, the government respectfully requests an extension until November 27 to evaluate the information provided by Mr. Sullivan and to submit an update to the Court.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

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cc: Clerk of Court (NGG) (by ECF)  
Counsel of Record (by ECF)